

REMARKS/ARGUMENTS

Applicants thank the Examiner for the careful consideration given the present application, and respectfully request favorable reconsideration of the application in view of the comments set forth below.

Claim Rejections – 35 U.S.C. § 103(a)

Claims 4, 5, 8-10, 16, 20, 21, 24-28, 32, 36, 37 and 54-57 stand rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,614,809 to Verma *et al.* (hereinafter “Verma”) in view of what is alleged to be well known in the networking art (hereinafter “Knowledge”). However, Applicants respectfully submit that the combination of Verma and Knowledge fails to disclose every feature of the amended claims.

With regard to claims 4 and 16, Applicants respectfully submit that the combination of Verma and Knowledge fails to teach, disclose, or otherwise render predictable a tunnel communication part that acquires an identifier and an IP address of a communication destination device from the server and then performs the tunnel communication. As claimed, the information processing device starts tunnel communication *after identifying the identifier and the IP address* of the communication destination device. Acquiring the identifier and the IP address of the communication destination device as claimed allows the tunnel communication part to identify the communication destination device before tunnel communications to the communication destination device begins, thereby enhancing the securing of such tunnel communications. In contrast the combination of Verma and Knowledge refer to first and second tunnel identifiers. However, these identifiers are merely incremented for every new tunnel communication session, and do not serve to identify the communication destination device, much less identify the communication destination device before tunnel communications begin as claimed.

Further with regard to claims 4 and 16, Applicants respectfully submit that the combination of Verma and Knowledge also fails to teach, disclose, or otherwise render predictable an address determination part that selects a caller address for the information-

processing device when the information-processing device is the source and a callee address, that is different than the caller address, for the information-processing device when the information-processing device is the destination. According to claim 4, the address of the information-processing device changes depending on whether the information-processing device is the caller or the callee, and for each tunnel communication. In this manner, the address can be used for different information-processing devices during different tunnel communications, expanding the number of information-processing devices available for tunnel communications. In contrast, the remote terminal of Verma has a network address, but Verma fails to disclose that this address changes depending on whether the remote terminal is a source or destination. Verma also fails to teach an address determination part of an information-processing device performs such a change as claimed. As such, numerous inquiries of a translator provided in the network of Verma are required, extending the time required to establish a tunnel communication in contrast to the subject matter in claim 4. Further, there are a finite number of information-processing devices (limited by the number of addresses) that can perform tunnel communications.

Applicants also respectfully submit that the features absent from Verma are not well known to one of ordinary skill in the art in view of the teachings of Verma. According to Verma, a translator is installed in the network to establish communication between computing devices on different networks. Such a translator eliminates the need to include information in target data to establish the callee and caller addresses as claimed.

Regarding claims 20 and 28, Applicants respectfully submit that the combination of Verma and Knowledge fails to teach, suggest or otherwise render predictable a server including an address determination part storing a relationship between a caller address to be assigned to a caller and a callee address to be assigned to a callee, wherein at least one of the callee address and the caller address can be assigned by the address determination part to a different information-processing device participating in a different tunnel communication. The temporary assignment of addresses by the server for *each* tunnel communication based on the source and destination of the tunnel communication allows addressed to be recycled, and reused for different information-processing devices during different tunnel communications. And, as claimed, an information-processing device can be assigned a different address during a different tunnel communication depending on whether that information-processing device is the callee or caller.

As explained above, Verma does not disclose changing addresses, or reusing addresses, which is employed for increased speed and flexibility in establishing tunnel communications in claim 20.

Applicants also respectfully submit that the features absent from Verma are not well known to one of ordinary skill in the art in view of the teachings of Verma. According to Verma, a translator is installed in the network to establish communication between computing devices on different networks. Such a translator eliminates the need to include information in target data to establish the callee and caller addresses as claimed.

And with regard to claim 32, Applicants respectfully submit that the combination of Verma and Knowledge fails to teach, suggest or otherwise render predictable a method including a step of defining a relationship between at least a caller address for a caller and a callee address for a callee in each tunnel communication, where “at least one of the caller address and the callee address is to be used for different information-processing devices involved in a plurality of different tunnel communications.” Again, for reasons analogous to those set forth above, the network components in Verma have a network address specific to their respective networks, but a translator is provided to resolve and addressing issues between the networks. Neither Verma nor Knowledge teach, suggest or otherwise render predictable that at least one of the caller address and the callee address is to be used for different information-processing devices involved in a plurality of different tunnel communications.

For at least the above reasons, Applicants respectfully submit that the combination of Verma and Knowledge fails to teach, suggest or otherwise render predictable every feature recited in claims 4, 16, 20, 28 and 32 as required to maintain a rejection of those claims for purposes of 35 U.S.C. §103(a). Further, Applicants respectfully submit that one of ordinary skill would not find the absent features obvious in view of the teachings of Verma.

New claim 58 has been added by way of this amendment. With regard to claim 58, the combination of Verma in view of Knowledge is silent about a comparison of the device identifiers, much less a least significant digit of the device identifiers.

The remaining claims in the present application are allowable for the limitations therein and for the limitations of the claims from which they depend.

In light of the foregoing, it is respectfully submitted that the present application is in condition for allowance and notice to that effect is hereby requested. If it is determined that the application is not in condition for allowance, the Examiner is invited to initiate a telephone interview with the undersigned attorney to expedite prosecution of the present application.

If there are any fees resulting from this communication, please charge same to our Deposit Account No. 16-0820, our Order No.: MTIS-40442.

Respectfully submitted,
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